

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

v. )

JOHN RYAN )

CRIMINAL NO. 03-10372-NG

U.S. DISTRICT COURT  
DISTRICT OF MASS.

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U.S. DISTRICT COURT  
DISTRICT OF MASS.

**DEFENDANT JOHN RYAN'S MOTION  
FOR MODIFICATION OF RELEASE CONDITIONS  
(NO OBJECTION BY GOVERNMENT OR PRETRIAL SERVICES)**

Defendant John Ryan ("Mr. Ryan") hereby moves the Court to modify his current release conditions by allowing him to travel to job interviews and any employment he obtains, as approved by pretrial services. As grounds for this motion, Defendant asserts:

1. Since September 5, 2003, Mr. Ryan has been released on an unsecured bond with certain conditions, including that his travel be limited to 911 emergencies, court appearances, appointments with counsel, only under electric monitoring.
2. Mr. Ryan has been assisting his nephew in his dog training business, but would like to seek paying employment.
3. Mr. Ryan will notify pretrial services of any job interviews and his travel to such interviews would be subject to its approval. Moreover, pretrial services would approve of any proposed employment and would modify his electronic monitoring accordingly to allow him to meet his work schedule.
4. The Pretrial Services Officer assigned to Mr. Ryan's case, John R. Riley, was notified

Date:

1/21/04

of this motion and has no objection to it.

5. The government also does not object to this motion, provided that Mr. Ryan follow the procedures outlined above.

WHEREFORE, Mr. Ryan respectfully requests that the Court order that Mr. Ryan's release conditions be modified to allow Mr. Ryan to travel to and from job interviews and to his employment, as approved by pretrial services.

Respectfully submitted,  
JOHN RYAN  
By his attorneys,

*Karen A. Pickett*

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DATED: January 21, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail/by hand.

Date:

1/21/04 Karen A. Pickett